UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

ALEXANDER PLADOTT,	
Plaintiff)
v.))) CIVIL ACTION
) NO. 05-10356-RWZ
LARRY EWERS,)
JOHN DOES 1 – 5)
JOHN DOES 6 – 10,)
Defendants.)
)

AFFIDAVIT OF ALEXANDER PLADOTT

- I, Alexander Pladott, being duly sworn, hereby depose and states as follows:
- I am the Plaintiff in this case. I am a citizen of the United States and I reside at 20000 Winnetka Place, Woodland Hills, CA 91364.
- 2. I believe that the Defendant, Larry Ewers ("Ewers"), has made a misrepresentation to this Court in connection with the obtaining of a default judgment which he is about to obtain against Christopher Patrick Heron ("Heron") in <u>Ewers v. Heron, et al.</u>, C.A. No. 04-10024-RWZ.
- 3. In particular, Ewers requested and obtained an entry of default against Heron pursuant to Fed.R.Civ.P. 55(a), by representing to the Clerk of this Court that he had served Heron with the Complaint and Summons from C.A. No. 04-10024-RWZ.

- 4. In fact, Ewers never served Heron with the Complaint and Summons from C.A. No. 04-10024-RWZ. Instead, Ewers served Heron with a document from another lawsuit against Heron, C.A. No. 02-10532-RWZ, in which Ewers sought to intervene.
- I have personal knowledge concerning the alleged service of the Complaint and Summons in C.A. No. 04-10024-RWZ because I was involved in the process with Ewers.
- 6. At the outset of the process, on January 15, 2004, Ewers confirmed to me by e-mail (Exhibit "A") that Heron should be served "through the Hague Convention process."
- 7. On March 9, 2004, Ewers e-mailed me (Exhibit "B") a copy of a letter that his lawyer, Alan Spiro, sent to Mr. Josh Cobb, APS International Ltd., regarding the service of the Complaint and Summons in C.A. No. 04-10024-RWZ. Attorney Spiro "re-enclosed" the following in his letter:
 - A. Two (2) original summons of Case #04-10024-RWZ
 - B. Two (2) certified copies of the Complaint.
- To the best of my knowledge, APS International Ltd. never effected any service on Heron.
- 9. On March 23, 2004, Ewers informed me via e-mail (Exhibit "C") that Heron was **not** served and that he had requested a legal opinion regarding whether he could hire an independent service to serve Heron, or would have to go through the court system.

- 10. On March 26, 2004, Ewers informed me via e-mail (Exhibit "D") that he received legal advice to "serve Heron using our guy and his procedure then we will continue service under Hague Convention."
- On March 26, 2004, Ewers e-mailed me a copy of the e-mail he received from Attorney Spiro with the following legal advice: "Larry, Here are the relevant provisions of the Hague Service Convention. I have no objection to your causing informal service upon Heron, it is only that informal service of the kind you propose will be subject to attack either in the US, or more emphatically, of and when you attempt to enforce a judgment in the UK." (Exhibit "E")
- 12. On March 29, 2004, I forwarded Ewers a proposal that I had received from Mark Parfitt of "Specialist Private Investigators" related to the informal service on Heron (Exhibit "F").
- 13. On the same day, Ewers responded to me by e-mail (Exhibit "G") stating: "I will forward papers needed for service."
- 14. On March 31, 2004, I e-mailed Ewers (Exhibit "H") all the information he needed to serve Heron by using Mark Parfitt.
- 15. On March 31, 2004, Ewers e-mailed me (Exhibit "I") confirming that he had sent the documents to be served to Heron to Mark Parfitt by FedEx, tracking number 4663-096-7850.
- 16. On April 2, 2004, I looked up FedEx tracking number 4663-096-7850 and saw that Ewers sent the documents to be served on Heron to Mark Parfitt from his home address in Corpus Christi, Texas. (See printout of tracking number 4663-096-7850 attached as Exhibit "J").

- 17. Mr. Parfitt's employee served the document which Ewers forwarded to Mr. Parfitt, and Ewers paid Mr. Parfitt for his services (Exhibit "K").
- 18. I believe that Ewers actually sent his Motion to Intervene in C.A. No. 02-10523-RWZ to Mark Parfitt instead of the Complaint and Summons in C.A. No. 04-10024-RWZ for the purpose of confusing Heron and misleading him so that he would not respond to the Complaint in C.A. No. 04-10024-RWZ and consequently would be in default.
- 19. I am informed and I believe that Ewers intends to use the Judgment which he is about to obtain against Heron for the purpose of collecting \$1.6 billion of Heron's frozen assets in two unknown jurisdictions. Ewers refuses to provide me with any additional information regarding these frozen assets.
- 20. Ewers had agreed, on behalf of his principal, Howard Eugene Liner, to share any recovery that he realizes with the creditors that I represent, but is now refusing to do so.
- 21. I fear that if Ewers obtains a judgment and manages to free up Heron's frozen assets, he will secrete or waste them and a lawsuit against him will be to no avail.
- 22. This unjust scenario should be prevented by this Court by not granting Ewers a Judgment at this time in C.A. No. C.A. No. 04-10024-RWZ on the basis that he failed to effectuate a proper service of Heron, and misrepresented to the Court that he did so.

Date: August 18, 2005

Woodland Hills, CA 91364

Alexander Pladott

State of California

) ss.

County of Los Angeles

Subscribed and sworn to (or affirmed) before me on this 18th day of August 2005 by Alexander Pladott, proved to me on the basis of satisfactory evidence to be the person who appeared before me.

Notary Public

S. STONE Commission # 1556850 Notary Public - California Los Angeles County My Comm. Expires Mar 5, 2009

Title of Document: Affidavit of Alexander Pladott

Document Date: August 18, 2005 Number of Pages: 4

EXHIBIT "A"

Page 7 of 21

Page 1 of 1

Page 2 of 2

Subj.

Re: Heron

Date:

1/15/2004 2:26:23 PM Pacific Standard Time

From: To:

lewers@stx.rr.com Ss4re@aol.com

Mr. Pladott:

No!

Even though we paid for faster service it still has to go through the Hague Convention process and once it comes out the process will speed up.

Instead of 12-16 weeks expect from 6-8 weeks before he will be served. The time frame I mentioned is not solid. As mentioned, it first has to come out, and then they can give me a time frame.

If possible, could you have your friend in London check on his residence?

Larry

---- Original Message -----From: Ss4re@aol.com To: lewers@stx.rr.com

Sent: Thursday, January 15, 2004 3:15 PM

Subject: Re: Heron

I will start to work on this right away. Have you heard if Heron was served?

Alex

EXHIBIT "B"

Page 1 of 2

Subi:

Fw: Service on Heron

Date:

3/9/2004 2:20:39 PM Pacific Standard Time

From: To:

lewers@stx.rr.com Ss4re@aol.com

Mr. Pladott:

Please see attachment from Mr. Spiro.

Thanks,

Larry

---- Original Message -----

From: aspiro@edwardsangell.com

To: iewers@stx.rr.com

Cc: LCrossley@edwardsangell.com Sent: Tuesday, March 09, 2004 4:14 PM

Subject: Service on Heron

I sent the attached to APS, which is our agent for effecting service.

Boston, Ft. Lauderdale, Hartford, New York, Providence, Short Hills NJ, Stamford, West Palm Beach, London (Representative office)

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Alan M. Spiro Direct Dial: 617.951.2204 Direct Fax: 888.325.9124 E-Mail: aspiro@EdwardsAngell.com

March 9, 2004

VIA FEDERAL EXPRESS

Josh Cobb APS International, Ltd. / The Civil Action Group APS International Plaza 7800 Glenroy Road Minneapolis, MN 55439-3122

RE:

APS File No. 240184

Larry Ewers v. Christopher Patrick Heron et al. U.S. District Court Case No. 04-10024 RWZ

Dear Josh:

Thank you for our telephone conversations yesterday and today. As I informed you, an investigator retained by my client, Mr. Ewers, confirmed in London yesterday (Monday March 8) that Mr. Heron still resides at the given address, 21 Dale House, Boundary Road, London NW8 OJB. Enclosed please find copies of photographs of Mr. Heron, in case they might be of assistance to the Bailiff. As you suggested, I re-enclose the materials that were returned to me:

- 1. Two original Summonses in a Civil Case issued by the US District Court for the District of Massachusetts, Civil Docket no. 04-10024 RWZ; and
- 2. Two certified copies of the Complaint.

Thank you very much for your prompt assistance with this matter. Please ensure that Mr. Heron is served as soon as humanly possible.

Very truly yours,

Alan M. Spiro

cc:

Larry Ewers

Leslie Crossley

EXHIBIT "C"

Page 1 of 3

Page 1 of 1

Subi:

Solicitor

Date:

3/23/2004 12:21:25 PM Pacific Standard Time

From: To: lewers@stx.rr.com Ss4re@aol.com

Mr. Pladott:

What is your feelings concerning hiring a solicitor to represent the creditors only? I understand Malcolm's statement about not rushing giving Pike time to determine there is not a conflict of interest. All of that is nice, but it does not address the creditors lack of representation in the UK. At no time since Feldman have we, the creditors had true representation.

There is no way I will ever believe we have exhausted all legal means to get Heron back in court. From day one after he started his innuendos, accusations, etc.etc. there has been a mentality in the UK to cover their rear ends. Due to the fact this tactic has been successful he will not change his modus operandi. We must be represented, or at lease have someone give us legal advice to determine if we are at a dead end, or can we aggressively address a course to get Heron back before the court. All of the information they have indicating he has committed purjury does not seem to matter.

I do not anticipate receiving answers from Pike on what body regulates Mrs. Hancock. By doing so he would admit his recommendations to Malcolm are without legal precedent.

Malcolm's solicitors have allowed Heron to make a mockery of the system and they show no intentions of challenging him. Malcolm is a man who speaks out of both sides of his mouth. It depends on who he is talking to and how it will affect his rear end. At times, I have felt he was an ally, but it is quite oblivious he is not.

With your experience in dealing with the Europeans, I must use your knowledge. I would guess close to 75% of our legal bills in the UK ,after Feldman, has been defending ourselves. I see no end to this cost unless we get someone who works only for us and we can have an input into actions we can and should take. Pike was a mistake. Simon was a mistake. Reasons are quite clear, they were not working or looking out for our interest. We are outsiders.

I have requested copies of the activity sheets in the UK on the service of Heron. It is unreal the amount of money we have paid, and continue to pay for incomptence. I have requested an legal opinion on the question can I hire an independent to serve him or do we have to go through the court system.

In closing, I make note of Malcolm's email this morning.

Wishing you, Susan and Assail a good day. I will out of town tomorrow, but should hear late in the day the results of the conference tomorrow.

Regards,

Larry

EXHIBIT "D"

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Page 1 of 1

Subj:

Service

Date:

3/26/2004 3:40:48 PM Pacific Standard Time

From: To:

lewers@stx.rr.com Ss4re@aol.com

Mr. Pladott;

Please legal advice I received late afternoon.

"The bailiff do not farm out- the bailiff performs the service. The advice: Serve Heron using our guy and his procedure then we will continue service under Hague Convention. Do not worry about too much service-only worry about too little."

On Monday we will obtain information on what he needs and I will forward it to him.

Wishing you a nice weekend.

Regards,

Larry

EXHIBIT "E"

Page 1 of 2

Subj:

Fw: Solicitor

Date:

3/26/2004 12:31:53 PM Pacific Standard Time

From: To: lewers@stx.rr.com Ss4re@aol.com

Mr. Pladott:

Please see email from Mr. Spiro.

Thanks,

Larry

---- Original Message -----

From: aspiro@edwardsangell.com

To: lewers@stx.rr.com

Sent: Friday, March 26, 2004 1:25 PM

Subject: Re: Solicitor

Larry, here are the relevant provisions of the Hague Service Convention. I have no objection to your causing informal service upon Heron; it is only that informal service of the kind you propose will be subject to attack either in the US or, more emphatically, if and when you attempt to enforce a judgment in the UK.

CHAPTER I - JUDICIAL DOCUMENTS

Article 2

Each Contracting State shall designate a Central Authority which will undertake to receive requests for service coming from other Contracting States and to proceed in conformity with the provisions of Articles 3 to 6.

Each State shall organise the Central Authority in conformity with its own law.

Article 5

The Central Authority of the State addressed shall itself serve the document or shall arrange to have it served by an appropriate agency, either –

- a) by a method prescribed by its internal law for the service of documents in domestic actions upon persons who are within its territory, or
- b) by a particular method requested by the applicant, unless such a method is incompatible with the law of the State addressed.

Subject to sub-paragraph (b) of the first paragraph of this Article, the document may always be served by delivery to an addressee who accepts it voluntarily.

Article 6

The Central Authority of the State addressed or any authority which it may have designated for

Page 2 of 2

that purpose, shall complete a certificate in the form of the model annexed to the present Convention.

The certificate shall state that the document has been served and shall include the method, the place and the date of service and the person to whom the document was delivered. If the document has not been served, the certificate shall set out the reasons which have prevented service.

Boston, Ft. Lauderdale, Hartford, New York, Providence, Short Hills NJ, Stamford, West Palm Beach, London (Representative office)

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EXHIBIT "F"

Case 1:05-cv-10356-RWZ

Filed 08/22/2005 Document 19

Date: 3/29/2004 Time: 12:30:06 PM

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Page 1 of 1

Page 1 of 1

Subj:

(no subject)

Date:

From: Susan Stone To: Alex

3/29/2004 12:14:02 PM Pacific Standard Time

From:

specialistpi@fsmail.net

To:

Ss4re@aol.com

Dear Mr. Pladott,

Further to our recent telephone conversations, I can confirm the following information:

Agreement to serve papers on Christopher Heron and swear affidavit confirming service at county court local to Heron's address.

Fee for services will depend on duration spent awaiting Heron. Fees charged at per hour, minimum of 4 hours plus 1 hour travel. Address for FEDEX of service papers: SPI, 14 Eleanor Road, Chalfont St Peter, Gerrards Cross, Bucks, SL9 9LZ. I would anticipate that we would be able to commence proceedings in the week commencing April 5.

Sincerely,

Mark Parfitt

Specialist Private Investigators

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EXHIBIT "G"

Page 21 of 21

Page 1 of 2

Page 1 of 1

Subj:

Re: (no subject)

Date:

3/29/2004 1:03:22 PM Pacific Standard Time

From: To: lewers@stx.rr.com Ss4re@aol.com

Mr. Pladott:

I will forward papers needed for service.

Thank you for your prompt attention.

Larry

---- Original Message -----From: Ss4re@aol.com To: lewers@stx.rr.com

Sent: Monday, March 29, 2004 2:49 PM

Subject: Fwd: (no subject)

EXHIBIT "H"

Subj:

Date:

3/31/2004 10:49:30 AM Pacific Standard Time

From:

specialistpi@fsmail.net

To:

Ss4re@aol.com

Sent from the Internet (Details)

Dear Mr. Pladott.

Full contact details as follows: SPI, 14 Eleanor Road, Chalfont St Peter, Bucks, SL9 9LZ, England, UK. Telephone/fax +44 1753 880 379, or +44 7789 20 10 70.

Banking details: Bank of Scotland, 59 Bath Street, Glasgow, G2 2DH, U.K. Account name SPI, Account number 06399553, Sort Code 12-24-81, Swift code BOFSGB2S.

Regards,

Mark Parfitt

Specialist Private Investigators

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EXHIBIT "I"

cument 19-2 Filed 08/22/2005 Date: 3/31/2004 Time: 1:00:38 PM Case 1:05-cv-10356-RWZ Document 19-2 Page 4 of 14

To: Alex Page 1 of 2 From:

Page 1 of 1

Subj: **Tracking**

Date: 3/31/2004 12:48:30 PM Pacific Standard Time

From: lewers@stx.rr.com To: Ss4re@aol.com Sent from the Internet (Details)

Mr. Pladott:

I was so upset with Fedex that I changed over to UPS Service with a guarantee of delivery by close of business on Friday.

Still can't believe thay failed to call me yesterday concerning lack of phone number. Unreal.

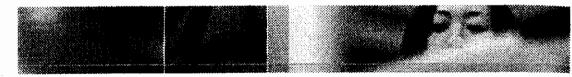
Tracking number: 4663 096 785 0

Regards,

Larry

EXHIBIT "J"





Home | About UPS | Contact UPS | Welcome Center

Tracking

- > Track by Tracking Number
- Track by Reference
- Number Import Tracking
- Numbers #
- Track by E-mail → Get Quantum View
- Files & → Request Quantum View
- Notify & Void a Shipment at
- → Help

Kaither gian. | Forgot Password Password:

Track by Tracking Number

View Details

Status:

Exception

Shipped to: Shipped or Billed on: Mar 31, 2004

CHALFONT ST. PETER, GB

Tracking Number: Service Type: Weight:

4663 0967 850 **EXPRESS** 1.00 Lb

Package Progress:

Date	Time	Location	Activity
Apr 2, 2004	2:20 P.M.	ABINGDON, GB	RECEIVER NOT IN ON 1ST DELIVERY ATTEMPT
	5:14 A.M.	ABINGDON, GB	IMPORT SCAN
	5:13 A.M.	ABINGDON, GB	OUT FOR DELIVERY
	12:11 A.M.	EAST MIDLANDS AIRPOR, GB	IMPORT SCAN
Apr 1, 2004	8:49 P.M.	DERBY, GB	ARRIVAL SCAN
* - *	8:08 A.M.	PHILADELPHIA, PA, US	DEPARTURE SCAN
	7:08 A.M.	PHILADELPHIA, PA, US	ARRIVAL SCAN
	5:23 A.M.	LOUISVILLE, KY, US	DEPARTURE SCAN
	1:11 A.M.	LOUISVILLE, KY, US	ARRIVAL SCAN
Mar 31, 2004	10:49 P.M.	US	BILLING INFORMATION RECEIVED
·	9:54 P.M.	SAN ANTONIO, TX, US	DEPARTURE SCAN
	8:45 P.M.	SAN ANTONIO, TX, US	ARRIVAL SCAN
	7:58 P.M.	CORPUS CHRISTI, TX, US	DEPARTURE SCAN
	7:08 P.M.	CORPUS CHRISTI, TX, US	ORIGIN SCAN

Tracking results provided by UPS: Apr 2, 2004 1:11 P.M. Eastern Time (USA)

NOTICE: UPS authorizes you to use UPS tracking systems solely to track shipments tendered by or for you to UPS for delivery and for no other purpose. Any other use of UPS tracking systems and information is strictly prohibited.

♦Back to Tracking Summary

* Back to Top

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EXHIBIT "K"

Page 1 of 1

Page 1 of 1

Subj:

Wire

Date: 4/19/2004 9:46:35 AM Pacific Standard Time

From: lewers@stx.rr.com
To: specialistpi@fsmail.net
CC: Ss4re@aol.com

Mr. Parfitt:

Wire transfer was sent out today 4-19-04.

Thanking you for your service.

Sincerely,

Larry Ewers

Bank of America

Bank of America, N.A. P.O. Box 25118 Tampa, FL 33622-5118

1.800.432.1000 www.bankofamerica.com Н

Page 1 of 4

Account Number: 0057 7844 6713 E0 P 0C Enclosures 28 47

Statement Period

04/01/04 through 04/30/04

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03099 001 SCM999 I 4 0

E.P.D. MANAGEMENT COMPANY, L.L.C. 13726 SUNTAN AVE CORPUS CHRISTI TX 78418-6051

Our free Online Banking service allows you to check account balances, transfer funds, pay bills and more. Enroll at www.bankofamerica.com.

Simplexanalysis: Spaincas: Pheaking

Account Summary Information

Statement Period 04/01/04 through 04/ Number of Deposits/Credits Number of Withdrawals/Debits	30/04 3 79	Statement Beginning Balance Amount of Deposits/Credits Amount of Withdrawals/Debits Statement Ending Balance	19,395.39 29,284.00 25,043.45 23,635.94
Number of Enclosures	28	Average Ledger Balance	20,813.23
Number of Days in Cycle	30	Service Charge	59.91

Deposits and Credits

Date Posted	Amount	Description	Bank Rofetence
04/08	13,460.00	Wire Type:Book IN Date:040804 Time:1523 Ct Trn:040408058008 Senders Ref:2004040800037071 Orig:Emery Resources Inc ID:0001589577756 Orig Bk: Bank One, N.A. ID:111000614 Pmt Det:/Rfb/040408007 535 /Imad/20040408K1Qjm01C001625	903704080058008
04/19	1,350.00	Deposit	813204730715657
04/27	14,474.00	Wire Type:Wire IN Date: 042704 Time:0951 Ct Trn:040427016971 Fdref/Seq:040427002105/000444 Orig:Emery Resources Inc ID:0001589577756 Snd Bk:B Ank One, N.A. ID:111000614	903704270016971

Withdrawals and Debits

Checks

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3397 *	70.63	04/05	813105830460333	3402	63.11	04/08	813009130324682
3398	262.36	04/01	813105930246945	3403	16.00	04/14	813204930212396
3399	110.50	04/01	813008230915501	3404	46.00	04/08	813204730608339
3400	27.06	04/06	813106030722740	3405	25.00	04/16	813008730638597

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Page 2 of 4

Account Number: 0057 7844 6713 EO P 0C Enclosures 28 Statement Period 04/01/04 through 04/30/04 0271 47

0271711

E.P.D. MANAGEMENT COMPANY, L.L.C.

Withdrawals and Debits - Continued

Checks

Check Number	e eeu ii			71 (2 kg) 11 (1 kg)			Seak Reforence
3406	100.00	04/13	813106130783908	3419	75.72	04/27	813009531758930
3407	95.00	04/09	813106130155830	3420	93.26	04/29	813008930201572
3409 *	25.00	04/15	813105930002519	3423 *	25.00	04/30	813106230466309
3410	78.45	04/16	813204830808646	5130 *	2,306,90	04/09	813204730790685
3411	40.41	04/19	813106030034939	5136 *	2,708.64	04/09	813204433193519
3412	1,479.00	04/14	813204730418016	5137	1,297.30	04/21	813204730362903
3413	202.44	04/20	813105930389223	5151 *	545.00	04/21	813204730362904
3414	634.80	04/23	813106230448719	5156 *	2.324.60	04/12	813008730875882
3418 *	18.57	04/26	813204830178245	5165 *	3,200.00	04/30	813204433392749

^{*} Preceding check (or checks) is outstanding, is included in summary listing, or has been included in a previous statement.

Other Dehits

Other Debit	ī S		
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04/01	300.00	Household Bank ;Des= online Pmt;Id= ckfxxxxx8957Pos	902540923522990
		Eff Date: 040401;Indn:Ewers,Larry	
04/06	350.33	85403 Aas ;Des= premium ;ID= 2493712486	902540963556489
		Eff Date: 040406;Indn:Larry Ewers	
04/08	10.00	Wire Transfer Fee	903704080048239
04/12	25.00	Retina And Vitre; Des= purchase ; ID= 3408 Houstx	902541030116899
		Eff Date: 040412;Indn:111017822271962	
04/13	600.00	Capital One ;Des= online Pmt;ID= 410339960080655	902541031626745
		Eff Date: 040413;Indn:2109491320Ewers Larry	
04/13	500.00	Household Bank ;Des= online Pmt;Id= ckfxxxxx8957Pos	902541031629246
		Eff Date: 040413;Indn:Ewers,Larry	
04/13	349.00	Capital One ;Des= online Pmt;ID= 410339960079842	902541031626738
		Eff Date: 040413;Indn:2298797651Ewers Larry	
04/19	540.00	Wire Type:Intl Out Date:041904 Time:1057 Ct	903704190023600
		Trn:040419023600 Related Ref:01040419001420Nn	
		Bnf:Specialist Private Investi ID:06399553 Bnf Bk:	
		Bank Of Scotland ID:Bofsgb2S Pmt Det:/Rec/Sort Cod	
0.4/0.6	400.10	E 12-24-81	
04/26	488.19	Capital One ;Des= check Pymt;ID= 3416	902541172109670
0.4/0/	201.60	Eff Date: 040426;Indn:7529101411469019076402	
04/26	321.62	Capital One ;Des= check Pymt;ID= 3417	902541172109680
04/2/	170.61	Eff Date: 040426;Indn:7529101411469019076648	0000111.00100
04/26	179.51	Capital One ;Des= check Pymt;ID= 3415	902541172109681
04/20	(2.75	Eff Date: 040426;Indn:7529101411469019076646	0004410400004644
04/30	63.75	Capital One ;Des= check Pymt;ID= 3422	902541210377643
Cand Assess	# 4625 TOOR O	Eff Date: 040430;Indn:7529101412069010064663	
O4/12	nt # 4635 7200 0 400.00		050604120006446
		BkofAmerica ATM 04/12 #000006446 Withdrwl	950604120006446
04/12 04/28	50.98 883.00	CheckCard 0409 Island Tire And Automot	905704090686336
04/30	400.00	CheckCard 0426 Apple Dental Center Inc	905704260479810
04/30	389.67	BkofAmerica ATM 04/30 #000009470 Withdrwl	950604300009470
04/30	307.07	CheckCard 0428 Sprint Pcs #472	905704280659386

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Account Number: 0057 7844 6713
E0 P 0C Enclosures 28 47
Statement Period
04/01/04 through 04/30/04 027173

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E.P.D. MANAGEMENT COMPANY, L.L.C.

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Withdrawals and Debits - Continued

Other Debits

Pare			Pank .
Posted	<u> </u>	LINE AT MI	Reference.
Subtotal	2,123.65		
	t # 4635 7200 (
04/02	88.77	CheckCard 0330 Julian Gold Inc	905703300418691
04/05	119.13	Heb Heb #204 04/04 #000682001 Purchase	950604040682001
04/05	38.92	Heb Heb #204 04/03 #000960001 Purchase	950604030960001
04/05	31.59	Eckerd Corpora 04/05 #000006135 Purchase	950604050006135
04/06	35.67	CheckCard 0405 Tuesday Morning #0113	905704050855281
04/06	33.45	Heb Heb #204 04/05 #000188600 Purchase	950604050188600
04/07	141.39	CheckCard 0405 Shannon'S	905704050122506
04/07	55.27	Heb Heb #270 04/06 #000722300 Purchase	950604060722300
04/09	115.29	Heb Heb #270 04/09 #000401600 Purchase	950604090401600
04/09	110.91	CheckCard 0407 Shoe Cents #83	905704070136190
04/12	69.66	Heb Heb #204 04/12 #000822400 Purchase	950604120822400
04/14	86.57	CheckCard 0413 Stein-Mart #0061	905704130659077
04/14	75.56	Samsclub #8267 04/14 #000466940 Purchase	950604140466940
04/14	57.47	Wal-Mart #0470 04/14 #000578523 Purchase	950604140578523
04/14	31.46	Heb Heb #270 04/13 #000298200 Purchase	950604130298200
04/15	86.58	CheckCard 0413 The Mens Wearhouse #122	905704130077514
04/19	75.74	CheckCard 0417 Stein-Mart #0056	905704170289091
04/20	334.41	Dillard'S # 72 04/20 #000673134 Purchase	950604200673134
04/20	92.74	Sou Foley'S #4 04/20 #000008606 Purchase	950604200008606
04/20	64.94	CheckCard 0418 Stein-Mart #0084	905704180802087
04/22	62.76	Eckerd Corpora 04/22 #000008212 Purchase	950604220008212
04/23	36.79	Heb Heb #270 04/22 #000168100 Purchase	950604220168100
04/26	75.77	CheckCard 0422 The Mens Wearhouse #122	905704220002145
04/26	53.16	Heb Heb #204 04/24 #000743400 Purchase	950604240743400
04/26	50.54 32.46	Heb Heb #204 04/26 #000203700 Purchase	9 5 0604260203700 905704220356207
04/26		CheckCard 0422 Linens N Things #194	
04/27	108.02	Samsclub #8267 04/27 #000425921 Purchase	950604270425921
04/28	82.21	Bed, Bath & Be 04/28 #000000819 Purchase	950604280000819
04/28	69.91	Eckerd Corpora 04/27 #000008793 Purchase	950604270008793
04/29	504.00	CheckCard 0427 Apple Dental Center Inc	905704270335714
04/29	216.49	CheckCard 0427 The Mens Wearhouse #122	905704270079028
04/29	28.10	CheckCard 0428 Shoe Carnival #239	905704280711132
04/30	41.60	Eckerd Corpora 04/30 #000009086 Purchase	950604300009086
Subtotal	3,107.33		

Daily Ledger Balances

Date					Bajance
04/01 04/02 04/05	18,585.31 18,496.54 18,236.27	04/13 04/14 04/15	21,160.82 19,414.76 19,303.18	04/23 04/26 04/27	16,622.40 15,402.58 29,692.84
04/06 04/07 04/08 04/09 04/12	17,789.76 17,575.91 30,916.80 25,580.06 22,709.82	04/16 04/19 04/20 04/21 04/22	19,199.73 19,893.58 19,199.05 17,356.75 17,293.99	04/28 04/29 04/30	28,657.72 27,815.87 23,635.94

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Account Number: 0057 7844 6713 EO P OC Enclosures 28

Statement Period

04/01/04 through 04/30/04 0271713

E.P.D. MANAGEMENT COMPANY, L.L.C.

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Account Analysis

Activity Charges

Activity Analyzed	Number	Charge
FDIC Assessment	1	0.25
Wire - Incoming	1	10.00
Bank Assisted Wire	1	45.00
Checks Paid / Other Debits Fee	28	3.36
Deposits / Other Credits Fee	1	0.40
Items Deposited Fee	1	. 0.09
Maintenance	1	10.00
TOTAL ACTIVITY CHARGES		69.10

Analysis

Average Ledger Balance less float Average Collected Balance less 10% Reserve Requirement Average Available Balance	20,813.23 47.70 20,765.53 2,076.55 18,688.98
Earnings Allowance at 0.60000% less Total Activity Charges Net Service Charge Applied To Your Account	9.19 69.10 59.91

Message Center

We'd like you to know that the following changes will take effect on July 1, 2004. The monthly maintenance fee will change to \$13. This fee may be offset by the earnings allowance if you maintain sufficient positive collected balances during your statement cycle.

The fee for each insufficient funds item is based on the number of days during the current month and preceding 12-month period in which your account has had at least one insufficient funds item (each of these days is an "insufficient funds occurrence").

If your account has had 2 or fewer insufficient funds occurrences during the current month and preceding 12-month period, the fee is \$17 per item. If your account has had at least 3 but no more than 5 insufficient funds occurrences during the current month and preceding 12-month period, the fee is \$30 per item.

If your account has had 6 or more insufficient funds occurrences during the current month and preceding 12-month period, the fee is \$33 per item. The insufficient funds fee applies to a maximum of 5 items each day. You can avoid this fee by taking advantage of one of our overdraft protection plans.

The fee for an overdraft protection transfer will change to \$10 per transfer. Please call your bank representative or the Customer Service number on this statement if you have any questions or want to set up overdraft protection. We value your business and our associates will be happy to assist you.

EARN AWARD TRAVEL FAST - CALL 1.800.360.5080; -Earn FlightFund(R) Miles for purchases your business makes; -5,000 bonus miles after your first purchase; -Low intro APR on purchases and balance transfers for 6 months. APPLY for the America West(R) FlightFund(R) Visa(R) Business Card.

Apr 19 04 10:05a Larry Ewers

361 949-8258

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Certificate of Service	In the
$\int_{a_{m}} \frac{1}{a_{m}} dx = \int_{a_{m}} \frac{1}{a_{m$	Claim No. OZ-1053Z RWZ
	Claimant LARRY EWERS.
6	Defendant CHRISTOPHER. PATRICK MERON.
0. 242004	
On the Th APRIL 2004	(inscrt date)
the	(insert title or description of documents served)
a copy of which is attached to this notice was served on	(insert name of person served, including position i.e. parmer, director if appropriate)
· ·	
Tick as appropriate	
by first class post	by Document Exchange
by delivering to or leaving	by handing it to or leaving it with
by fax machine (time sent) (you may want to enclose a copy of the transmission sheet)	by e-mail
by other means (please specify) BY MAND	
at (insert address where service effected, ZI DALE HO	11 VE
at (insert address where service eyected, include fox or DX number or e-mail address) ROUNDAL	
LONDON	ა .
ENGLAN	β.
being the defendant's:	
residence registered office	
place of business other (please specify)	
The date of service is therefore deemed to be 7" APRI	
I confirm that at the time of signing this Certificate the do	cument has not been returned to me as undelivered.
Signed Signed	Position or
(Claimant)(Defendant)('s solicitor)('s litigation friend)	office held (if signing on behalf
Date 7 MKIL 2004	of firm or company)

CERTIFICATE

The undersigned authority has the honour to certify, in conformity with Article 6 of the Hague Convention

That the document hereby described: Civil Court Action 02-10523-RWZ District of Massachusetts Plaintiff Larry Ewers vs Defendant Christopher Patrick Heron

was served on:

April 07, 2004 08.18

(Date)

Christopher Patrick Heron

to:

at:

21 Dale House, Boundary Road,

London, NW8

(Place)

(Address)

by the follow method authorized by Article 5: By personal delivery to Christopher Patrick Heron at the above address who accepted it voluntarily. The document referred to above was delivered and served to Christopher Patrick Heron, whom the Server knew previously, at his residence at the above the address.

Attached is the document establishing the service.

Description of the document:

Certificate of Service

(Name and Title) (P)

JOHN LEONARD (SOULCARE)

STAMP or Seal

FINERS STEPHENS MINOCENT Solicitors 179 Great Portland Street London W1N 6LS